

REMARKS/ARGUMENTS

Applicant appreciates the consideration shown by the Office, as evidenced by the Office Action mailed on 19 April 2005 and the Advisory Action mailed on 15 June 2006. The has Examiner rejected claims 1-3, 5-7, 9, 13, 21, 22, and 26 under 35 USC 103(a) over Takakado et al. US5237260 (hereinafter "Takakado") in view of Johnson Jr. US5852558 (hereinafter "Johnson") and Glennon US4507724; rejected claim 4 under 35 USC 103(a) on Takakado, Johnson, and Glennon, and further in view of Lakey et al. US4883973; rejected claim 14 under 35 USC 103(a) on Takakado, Johnson, and Glennon, and further in view of Geis et al., US5903116; rejected claims 10, 12, and 23 under 35 USC 103(a) on Takakado, Johnson, and Glennon and further in view of Stanton et al. US4179729; rejected claims 8 and 15 under 35 USC 103 (a) on Takakado, Johnson, and Glennon and further in view of Nguyen US6067237; and rejected claims 11 and 24 under 35 USC 103(a) on Takakado, Johnson, and Glennon and further in view of ordinary skill in art.

Claims 1 and 21 have been amended, and claims 1-15, 21-24, and 25 remain under consideration in the present application. Applicant respectfully requests reconsideration of the application by the Examiner in light of the above amendments and following remarks offered in response to the Office Action.

Applicant traverses the rejection of claims 1-3, 5-7,9, 13, 21, 22, and 26 under 35 USC 103(a) over Takakado, Johnson, and Glennon.

With respect to Takakado, as stated in the Office Action, Takakado does "not disclose explicitly showing the inverter having a neutral output Applicant has added the wording "multi-phase" inverter by the present amendment (multi-phase systems are referenced in Applicant's paragraphs 18-19, for example). Applicant submits that, **Takakado does not describe an inductor coupling a leg of a multi-phase, multi-leg inverter to a neutral output**. Each of the independent claims has a corresponding recitation.

claim 1: wherein in an operational mode, the combined rectifier and [multi-phase] inverter provide generated power to the load port and generates a neutral output; and an inductor electrically coupling one of the legs of the inverter to the neutral output.

claim 21: a neutral output coupled to one of the legs of the [multi-phase] inverter through an inductor ...

The Office action has cited both Johnson and Glennon with respect to the neutral output.

With regard to Johnson, Applicant traverses the Office Action characterization of Johnson. The Office Action states:

... Johnson, Jr. teaches for the purpose of reducing step voltage changes, which affect the performance of loads that it is known for a device 400, use for outputting ac and dc voltages, having a plurality of legs that one of the legs (leg 430) is connected to a neutral output N through inductor L₃ (see figure 4).

However, Applicant submits that Johnson does not describe a multi-leg inverter but instead relates to a one leg inverter 420. Johnson describes element 410 as a first switching circuit operated as a rectifier, element 420 as a second switching circuit which is operated as an inverter, and a third switching circuit 430 operated as a balancer (column 5, lines 46-65). It is the balancer which is coupled to the neutral and not the inverter. Additionally, although Johnson references step voltage as being a problem in the background section (column 2), Johnson does not appear to teach that it is the coupling of the balancer or the single leg inverter to the neutral which is the solution.

The Office Action Response to Arguments states:

Johnson, Jr. discloses clearly a device 400, which has several components 410, 420, 430 (column 4, lines 59—64). Anyone with ordinary skill in the art would know that an electrical device is made of several components. It is further disclosed that component 430 is also a switching device, which is used in combination with the other switches (column 8, lines 15-17, 23-28). It is further disclosed that the load, inductor L_3 and voltage affect the switching devices 431, 432 (column 14, lines 13-17). Clearly, the leg 430 is a very functional device in the electronic device 400 for converting voltage and clearly, leg 430 is connected to a neutral output "N" through inductor L_3 . Moreover, the claims do not specify what is the use of the neutral output. The claims only describe that one of the legs is connected to a neutral output through an inductor, which is exactly what Johnson, Jr. discloses.

The Remarks argued that Johnson, Jr. discloses a leg being connected to a neutral output, but such leg functions differently. The claims do not disclose any functionality of the leg being connected to a neutral output, therefore such argument is moot since there is absolutely no description, in the claims, of what is the neutral leg doing and what is the functionality of it and how it functions different from the Prior Art.

Applicant submits that, although the components of Johnson together form power converter 400 and may be described as a "device," the components do not collectively form a **multi-phase** inverter. Instead, they are different circuits of the power converter 400 with one of them (420) appearing to operate as a single phase inverter.

With regard to Glennon, Applicant submits that Glennon does not include a leg coupled to the neutral through an inductor.

Therefore, Applicant respectfully submits that, even if the three references were combined, a prima facie case of obviousness is not present for claims 1 and 21 because the applied references do not teach, suggest, or disclose (either individually or in combination) the recitations of independent claims 1 and 21 and of dependent claims 2-3, 5-7, 9, 13, 22, and 26 which depend from one of the aforementioned independent claims.

The remaining dependent claims 4, 8, 10-12, 14-15, and 23-24 were each rejected under 35 USC 103(a) on Takakado, Johnson, and Glennon in view of other references directed to aspects other than the neutral output. Claims 4, 8, 10-12, 14-15, and 23-24 are likewise believed to be in condition for allowance regardless of whether the other references describe the other aspects.

In Summary, Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Should the Examiner believe that anything further is needed to place the application in even better

condition for allowance, the Examiner is requested to contact applicant's undersigned representative at the telephone number below.

Respectfully submitted,

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